

# **DOT 3 Hour Rule**

## **Trans States Airlines SOC Master Plan**

### **Background**

The Department of Transportation's (DOT) rule establishes a hard time limit of three hours after which airlines must allow passengers to deplane. While the rule applies to arriving and departing domestic flights, U.S. carriers operating international flights in the U.S. must specify, in advance, their own time limits for deplaning passengers.

The following exceptions to the 3-hour rule (domestic), 4-hour (international) apply:

- Safety or security reasons
- Air Traffic Control (ATC) advises the pilot-in-command that returning to the terminal would disrupt airport operations

DOT requires air carriers to:

Adopt contingency plans for lengthy tarmac delays and publish them on their Web sites. These plans must incorporate all Corporate and Stations plans as it pertains to this rule.

Trans States Airlines Code Share Partners Master Plans for Taxi Delays pertain to their mainline flights and **Regional Partners**, and includes diversions. These plans assure that Trans States Airlines will meet the guidelines of the DOT for tarmac delays. This includes the three-hour domestic time limit, as well as the four-hour international time limit. This plan ensures that Trans States Airlines will meet or exceed specified guidance as it pertains to provisioning, as follows: adequate food and water (prior to reaching 2 hours), lavatory facilities, medical attention and all other customer comfort needs. In the event the customer's needs cannot be met while on the aircraft, Trans States SOC will contact the code shares SOC Planners. These planners are responsible to contact the station to assure that adequate resources are provided for passenger accommodation.

Trans States Airlines SOC will assess the aircraft suitability for meeting the passenger needs (i.e. lavatories, climate control, etc.) and determine the best plan of action. We understand that Trans States' Code Share Partners have ensured that this plan has been coordinated with all airport authorities, U.S. Customs and Border Protection, and the Transportation Security Administration.

## **Trans States Airlines Plan and Responsibility**

The Trans States Airlines System Operations Control (SOC) is responsible for the management, quality, and decision making of the code share's master plan for all Trans States flights. The contracted ground handling vendor companies will carry out the plan at the station.

SOC will also be responsible for initiating the Trans States back-up plan when our code share partner is unresponsive, unable to provide an available gate or a viable solution necessary to adhere with the tarmac delay contingency plan. Trans States does not have gates or facilities at the airports that it serves. Trans States has coordinated response procedures with its mainline partners, American and United, to the extent practicable, to share facilities in the event of an extended delay.

It is the goal of the SOC to take all available information and make the best decisions possible to ensure compliance with the plan. In some cases that may mean flights with projected lengthy taxi delays of more than 2 hours will need to be canceled before even leaving the gate or flights will be instructed to return to the gate well in advance of the timeline below due to updated information.

When there is a known substantial delay to departure, the SOC will evaluate the length of the delay and will notify the station to hold boarding of the flight.

## **Gates and Facilities**

Trans States has contractual relationships with its mainline partners, American Air Lines ("American") and United Airlines ("United"), that provide for coordination for the use of gates and associated facilities in delay situations. Both American and United have submitted independent plans to the DOT, and much of those plans will also apply to Trans States as the mainline partners provide all ground and gate operations employees and facilities under contractual relationships with Trans States.

Trans States does not have gates or facilities at the airports that it serves. Trans States has coordinated response procedures with its mainline partners, American and United, to the extent practicable, to share facilities in the event of an extended delay.

## **SOC Plan**

### **DEPARTURE DELAYS:**

The SOC has expanded on its current procedures used for extended outbound delays to ensure the DOT 3 hour rule is enforced. It has identified actions that it needs to take, based on trigger points.

#### **Before Boarding at the Gate**

If Trans States anticipates a flight may be subject to a lengthy onboard ground delay before boarding passengers, a general announcement will be made to inform the passengers about the possibility of a lengthy onboard ground delay. Passengers may take appropriate action, such as determining whether they want to board or seek alternate transportation, cancel travel plans, or reschedule the trip consistent with airline ticketing policies. The passengers may obtain food and drink before boarding, or make other preflight arrangements.

#### **After Boarding Before an Aircraft Leaves a Gate**

If the SOC is made aware of a lengthy ground delay (i.e. Ramp closed due to hazardous conditions, last minute GDP, VIP movement, etc.) before the flight has departed the gate, the dispatcher will inform the flight crew to make an announcement to brief the passengers of the nature of the delay. This allows the passengers to determine whether they want to remain onboard, deplane to obtain food and drink, seek alternate transportation, cancel travel plans, or reschedule the trip consistent with airline ticketing policies.

Trans States will notify passengers on the delayed flight regarding the status of the delay every 30 minutes while the aircraft is delayed, including the reasons for the tarmac delay, if known. Trans States will notify the passengers on a delayed flight beginning 30 minutes after the scheduled departure time (including any revised departure time that passengers were notified about before boarding) and every 30 minutes thereafter that they have the opportunity to deplane from an aircraft that is at the gate or another disembarkation area with the door open, if the opportunity to deplane actually exists.

## **After an Aircraft Leaves a Gate**

### **60 minutes (1 hour)**

- Monitor taxi situation and plans
- Flight Crew will report on status. (Flight Crew receives an auto generated message via ACARS that instructs them to reply to SOC with update).

### **90 minutes (1:30 hours)**

- Review SOC and station plan
- Contact Station to advise them of a potential need to return to the gate.
- Gauge the event to determine the likelihood of the flight's potential to depart prior to the 3 hour mark
- The Flight Attendant initiates food and beverage service
- SOC sends out a notification to senior management with the following information:
  - FLT –
  - City Pair –
  - Minutes Out -
  - Status –
  - Actions –
  - Cause –
  - Expectations/Plan of Action -

## **105 Minutes (1:45 Hours)**

- Phone Contact is made from SOC to the Manager SOC or delegate to discuss situation and potential next steps.
- Alternates in call order -
  1. Director of Operations or the person in Operational Control
  2. Vice President/Chief Operating Officer
  3. Chief Pilot
  4. Director of Safety
  5. President

## **120 minutes (2 hours)**

- Assess need for return and verify gate availability.
- If the station does not have a gate readily available to accommodate the flight SOC will initiate contact with other airlines, airport authority, or FBO to obtain an alternate deplaning location.
- SOC Duty Manager updates the corporate leaders via email regarding the details of the flight, assessment of the situation and info on communications with the crew.
- In locations where 60 minutes is needed, notify code share partner of the situation and confirm the need to proceed to the alternate location.
- The Dispatcher will send an ACARS transmission to Crew with the onboard announcement:
  - LADIES AND GENTLEMEN, OUR FLIGHT CONTINUES TO BE IMPACTED BY xxxxx. CURRENT CONDITIONS ARE PREVENTING A TIMELY DEPARTURE. AS A RESULT OF A GOVERNMENT RULE, THE MAXIMUM TIME PASSENGERS ARE PERMITTED ONBOARD AN AIRCRAFT BEFORE TAKEOFF IS THREE (3) HOURS. THIS MANDATE MAY MAKE IT NECESSARY TO BEGIN OUR RETURN TO THE GATE OR AN ALTERNATE DEPLANING LOCATION VERY SHORTLY. OUR STRONG DESIRE IS TO TRANSPORT YOU TO YOUR DESTINATION. WE ARE CONTINUING OUR COORDINATION WITH AIR TRAFIC CONTROL TO FIND A RESOLUTION TO OUR CURRENT SITUATION AND WILL KEEP YOU INFORMED OF ANY FURTHER DEVELOPMENTS.
- ACARS to be returned to dispatch with crew assessment of passenger service issues (food, water, lavatories, mood, etc.)

**135 minutes (2:15 hours):**

- Assess need for return
- In locations where 45 minutes is needed, notify code share partner of the situation and confirm the need to proceed to the alternate location.
- SOC Duty Manager will update the notification with the current status of the flight.

**150 minutes (2:30 hours):**

- Initiate mandatory return to gate or alternate location (unless directed by Manager SOC or Director of Operations)
- SOC Duty Manager will update the corporate leaders via email regarding the details of the flight, assessment of the situation and information on communications with the crew.
- Notify our code shares SOC with updated information
- The Dispatcher will send an ACARS transmission to Crew with the onboard announcement:
  - LADIES AND GENTLEMEN, OUR FLIGHT CONTINUES TO BE IMPACTED BY xxxxx. CURRENT CONDITIONS ARE PREVENTING A TIMELY DEPARTURE. AS A RESULT OF A GOVERNMENT RULE, THE MAXIMUM TIME PASSENGERS ARE PERMITTED ONBOARD AN AIRCRAFT BEFORE TAKEOFF IS THREE (3) HOURS. THIS MANDATE REQUIRES OUR RETURN TO THE GATE OR ALTERNATE LOCATION VERY SHORTLY. OUR STRONG DESIRE IS TO TRANSPORT YOU TO YOUR DESTINATION. WE ARE CONTINUING OUR COORDINATION WITH AIR TRAFIC CONTROL TO FIND A RESOLUTION TO OUR CURRENT SITUATION AND WILL KEEP YOU INFORMED OF ANY FURTHER DEVELOPMENTS.
- ACARS to be returned to dispatch with crew assessment of passenger service issues (food, water, lavatories, mood, etc.)

## **165 Minutes (2:45 Hours) (Declaring an Emergency Situation)**

- SOC Duty Manager will initiate an emergency notification if the aircraft has not returned to the gate, or alternate location, or will not meet the requirement of a passenger door being open and passengers having the ability to deplane.
- Phone Contact is made from SOC to the Vice President/Chief Operating Officer to communicate with the code share's SOC and the senior leadership of our code shares for immediate assistance in resolving the emergency situation.
- Alternates in call order -
  - President of Trans States Holdings
  - Director of Operations
  - Director of Safety

After the flight has successfully either returned and allowed the passengers to deplane or departed before the 3 hour mark the SOC Duty Manager will complete the Tarmac Delay form with all the information that is available to the SOC for any event that exceeds 90 minutes. The completed form will then be provided to the Director of Safety.

The key to success is good communication. SOC will initiate discussion with station and crew (other agencies, as appropriate). Orders to return from the SOC are considered mandatory for other departmental representatives (Ground Operations, Flight Operations, etc.)

## **ARRIVAL DELAYS AND DIVERSIONS:**

The SOC will take these actions when handling inbound delays, to meet and exceed the three hour domestic time limit. \*Please note these guidelines differ from DOT guidelines.

### **60 minutes (1 hour)**

- SOC alerts (gating must be imminent)
- SOC sends out a notification to senior management with the following information:
  - FLT –
  - City Pair –
  - Minutes Out -
  - Status –
  - Actions –
  - Cause –
  - Expectations/Plan of Action -
- Notify code share partner of situation

### **75 minutes (1:15 hours)**

- SOC assessment (order 90 minute stations plan to begin)

### **90 minutes (1:30 hours)**

- Review SOC and Station Plan
- Contact Station to determine gate availability
- The Flight Attendant initiates food and beverage service



### **120 minutes (2 hours)**

- SOC Duty Manager updates the corporate leaders via email regarding the details of the flight, assessment of the situation and information on communications with the crew.
- In locations where 60 minutes is needed, notify code share partner of the situation and confirm the need to proceed to the alternate location.
- The Dispatcher will send an ACARS transmission to the crew with the onboard announcement:
  - LADIES AND GENTLEMEN, OUR FLIGHT CONTINUES TO BE IMPACTED BY XXXXX. CURRENT CONDITIONS ARE PREVENTING A TIMELY ARRIVAL INTO THE GATE. AS A RESULT OF A GOVERNMENT RULE, THE MAXIMUM TIME PASSENGERS ARE PERMITTED ON BOARD AN AIRCRAFT IS THREE (3) HOURS. THIS MANDATE MAY MAKE IT NECESSARY TO DEPLANE AT AN ALTERNATE LOCATION VERY SHORTLY. OUR STRONG DESIRE IS TO GET YOU TO THE GATE AS SOON AS POSSIBLE. WE ARE CONTINUING OUR COORDINATION WITH THE STATION TO FIND A RESOLUTION TO OUR CURRENT SITUATION AND WILL KEEP YOU INFORMED OF ANY FURTHER DEVELOPMENTS.
- ACARS to be returned to dispatch with crew assessment of passenger service issues (food, water, lavatories, mood, etc.)

### **135 minutes (2:15 hours):**

- Assess the need to proceed to alternate location. If necessary, notify code share partner of the situation and confirm the need to proceed to the alternate location.

### **150 minutes (2:30 hours):**

- Communicate mandatory deplaning location (unless directed otherwise by Manager SOC or Director of Operations)
- SOC Duty Manager updates the corporate leaders via email regarding the details of the flight, assessment of the situation and information on communications with the crew
- Notify code share partner of situation
- The Dispatcher will send an ACARS transmission to the crew with the onboard announcement.
  - LADIES AND GENTLEMEN, OUR FLIGHT CONTINUES TO BE IMPACTED BY XXXXX. CURRENT CONDITIONS ARE PREVENTING A TIMELY ARRIVAL. AS A RESULT OF A GOVERNMENT RULE, THE MAXIMUM TIME PASSENGERS ARE PERMITTED ON BOARD AN AIRCRAFT IS THREE (3) HOURS. THIS MANDATE MAY MAKE IT NECESSARY TO DEPLANE AT AN ALTERNATE LOCATION VERY SHORTLY. OUR STRONG DESIRE IS TO GET YOU TO THE GATE AS SOON AS POSSIBLE. WE ARE CONTINUING OUR COORDINATION WITH THE STATION TO FIND A RESOLUTION TO OUR CURRENT SITUATION AND WILL KEEP YOU INFORMED OF ANY FURTHER DEVELOPMENTS.
- ACARS to be returned to dispatch with crew assessment of passenger service issues (food, water, lavatories, mood, etc.)

### **165 minutes (2:45 hours): (Declaring an Emergency Situation)**

- SOC Duty Manager will initiate an emergency notification if the aircraft has not reached the gate or alternate deplaning location, or will not meet the requirement of a passenger door being open and passengers having the ability to deplane.
- Phone contact is made from SOC to the Vice President/Chief Operating Officer to communicate with the code share's SOC and the senior leadership of our code shares for immediate assistance in resolving the emergency situation.
- Alternates in call order –
  - President of Trans States Holdings
  - Director of Operations
  - Director of Safety

After the flight has successfully blocked in at a gate and deplaned, the SOC Duty Manager will fill out the Tarmac Delay Form with all the information that is available to the SOC for any event that exceeds 60 minutes. The completed form will be provided to the Director of Safety.

## **OFF-LINE DIVERSIONS:**

Diversions have the greatest potential for customer service failures. Knowing that technology is not always indicative of a customer's ability to deplane, Trans States Airlines will initiate the back-up plan to assure customer egress is allowed. Special consideration should be given to cities that are not normal serviced airports by our partners. Additional pre-planning may be required for these cities and diversions should be avoided if possible.

- Monitoring of in-times from stations to assure that "in" means customer have the ability to deplane
- ACARS transmissions to crew at 2:30 to assure door open and egress available
- SOC Duty Manager will coordinate with the code share's planner regarding diversion airport suitability:
  - Capacity constraints
  - Gate availability and aircraft capability
  - Aircraft ground support equipment available for the type of aircraft
  - Airport staff availability to handle extra flights
  - TSA, CBP, and Centers for Disease Control and Prevention (CDC) availability, as appropriate
  - Availability of local hotels, buses, and medical support
- ACARS to be returned to dispatch with crew assessment of passenger service issues (food, water, lavatories, mood, etc.)
- Stations training to ascertain that a "door open within three hours" is mandatory and that there must be a policy to allow this, even in the case of multiple diversions
- SOC Duty Manager will communicate with ATC desk to prioritize diverted flights and use the Diversion Recovery Tool

In the case of a diversion the SOC Duty Manager will follow the timeline and procedures established above Extended Taxi out Delays.